IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

ROLANDO BELTRAN	§	
	§	
Plaintiff,	§	
	§	**5:15-CV-1019-RP**
v.	§	
	§	
UNION PACIFIC RAILROAD COMPANY	§	
	§	
Defendant.	§	

PLAINTIFF ROLANDO BELTRAN'S REPLY TO DEFENDANT UNION PACIFIC RAILROAD COMPANY'S FIRST SUPPLEMENT TO ITS MOTION FOR SUMMARY JUDGMENT [DOCUMENT 49]

TO THE HONORABLE JUDGE ROBERT PITMAN:

NOW COMES Plaintiff, Rolando Beltran by and through undersigned counsel and hereby requests an opportunity to reply to the to Defendant, Union Pacific Railroad Company's First Supplement to Its Motion for Summary Judgment [Document 49] and would show the Court as follows:

1. On December 15, 2016 Defendant, Union Pacific Railroad Company filed its Motion for Summary Judgment [Document 42].

2. On January 25, 2017 Plaintiff, Rolando Beltran filed his Opposition to Defendant's Motion for Summary Judgment [Document 48].

3. On January 30, 2017 Defendant filed its First Supplement to Its Motion for Summary Judgment [Document 49] and attached **Exhibit A**, Laboratory Report (Bottle B Re-Test).

4. Plaintiff respectfully requests an opportunity to file a supplemental report from Plaintiff's expert in response to the Defendant's First Supplemental Motion to Summary

Judgment, Plaintiff attaches hereto **Exhibit 1**, Supplemental Declaration of Michael P. Zeitlin, M.D.

Respectfully submitted,

/s/ Edward L. Piña

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Plaintiff's has been duly served upon Defendant via electronic service and/or facsimile upon the following:

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on this 20th day of February, 2017.

/s/ Edward L. Piña

Edward L. Piña